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Drug Testing Section
Division of Workplace Programs
SCAP
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Dear Mr. Vogl

I undertake this writing out of deep concern for the proposed change to the SAMSHA guideline volume 69, number 71, federal register. I am currently serving as the Commanding Officer of The Chicago Police Department Random Drug Testing Unit. The Chicago Police Department has been employing the use of hair testing since 1997 for pre-employment testing with great success. I am personally involved with every pre-employment screening and would like to pass along some personal observations. The Chicago Police Department collects about 15 percent of its hair samples from body hair. Upon completion of literally thousands of hair collections there has not been a single complaint regarding body hair collection. In fact the contrary is true, applicants on occasion grumble about the collection of head hair on the basis of vanity. It is my personal opinion that body hair, with the exception of pubic hair, is less invasive in nature than head hair as body hair collections are much less conspicuous.

The elimination of body hair as a collection source would pose grave consequences for the Chicago Police Department and many other agencies. It would amount to pure gambling on the hiring of fifteen percent of our prospective recruits. This is certainly a step backwards rather than forward in an era of increased risks with home security. Consider that there is a demonstrable correlation between those applicants who shave their heads to defeat the collection of head hair and positive results. To eliminate the remaining alternatives is simply poor public policy.

I congratulate you on the decision to include hair within SAMSHA guidelines. I urge you to consider the reality of eliminating body hair as a source. Such a proposal clearly lacks any degree of common sense, is counter productive, and relegates the most efficient form of drug testing to an 85% guess.

Sincerely



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